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**PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR  
AUTHORITY TO CHANGE RATES**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
SECOND SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Second Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) calendar days of service hereof or no later than **November 16, 2020**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

**DEFINITIONS**

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

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5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

### **INSTRUCTIONS**

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

**HERRERA LAW & ASSOCIATES, PLLC**

PO Box 302799

Austin, Texas 78703

4524 Burnet Road

Austin, Texas 78756

(512) 474-1492 (voice)

(512) 474-2507 (fax)

By: /s/Sergio Herrera

Alfred R. Herrera

State Bar No. 09529600

aherrera@herrerlawpllc.com

Brennan J. Foley

State Bar No. 24055490

bfoley@herrerlawpllc.com

Sergio E. Herrera

State Bar No. 24109999

sherrera@herrerlawpllc.com

service@herrerlawpllc.com

**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

### CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's Second Set of Requests for Information to SWEPCO* upon all known parties of record by electronic email, fax and/or First class mail on this the 26th day of October, 2020.

By: /s/Leslie Lindsey

Leslie Lindsey

**EXHIBIT A**

**PUC DOCKET NO. 51415**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ELECTRIC POWER COMPANY FOR</b>	<b>§</b>	
<b>AUTHORITY TO CHANGE RATES</b>	<b>§</b>	<b>OF TEXAS</b>

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
SECOND SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 2-1. Please provide the equivalent availability factor and capacity factor for each SWEPCO generating unit for each month since January of 2017.
- 2-2. Please provide SWEPCO's current peak demand, capacity resource (MW) and reserves (MW) forecast, including capacity resource (MW) retirements and additions, for the next 10 calendar years.
- 2-3. Please identify the in-service dates, nameplate capacity (MW) and estimated firm capability (MW) of each new SWEPCO generating resource under construction or planned for the next 10 calendar years.
- 2-4. Please identify any generating unit outages during the test year for which SWEPCO has received or expect to receive insurance or vendor settlements and explain how these settlements have been treated for ratemaking purposes.
- 2-5. Please identify the total change in SWEPCO system peak demand, energy sales, reserve capacity and reserve margin attributable to SWEPCO wholesale power sale load reductions for each year since 2016 and as forecasted for each of the next three calendar years.
- 2-6. Please identify by project and provide the associated cost of capital investments requested for the first time in this case whose primary purpose is to increase the operating efficiency or availability or capacity rating of SWEPCO generating facilities.
- 2-7. Please identify by project and provide the associated cost of capital investments requested for the first time in this case whose primary purpose is to increase the reliability of SWEPCO distribution service in Texas.
- 2-8. Please provide the net revenues from sales of each type of ancillary service supplied from each SWEPCO generating or purchased power resource for each of the last three calendar years and the test year.

- 2-9. Please provide the average bid price of energy (\$/MWh) supplied to the SPP market from each SWEPCO generating or purchased power resource for each of the last three calendar years and the test year.
- 2-10. Please provide SWEPCO's most recent studies evaluating the economic viability of continued operations of each Company owned generating unit, and supporting scheduled retirement dates of such units, along with underlying commodity price and operating cost assumptions.
- 2-11. Please provide the number, type, average remaining life and net book value of customer meters on SWEPCO's system and for the Company's Texas service area.
- 2-12. Please provide AEPSC billings to SWEPCO by account for each of the last three calendar years and for the test year along with allocation factors used to determine billings to SWEPCO in each account.
- 2-13. Please provide any adjustments proposed by SWEPCO to Dolet Hills non-fuel O&M expenses or AEPSC billings to SWEPCO to reflect the anticipated retirement of Dolet Hills.
- 2-14. Reference page 6, lines 8-13 of SWEPCO witness Seidel's direct testimony, please provide O&M expenses incurred for each of the three categories of distribution reliability programs for each of the last three calendar years and for the test year, for the total SWEPCO system and for the Texas retail jurisdiction.
- 2-15. Reference page 6, lines 8-13 of SWEPCO witness Seidel's direct testimony, please provide capital expenditures incurred for each of the three categories of distribution reliability programs for each of the last three calendar years and for the test year, for the total SWEPCO system and for the Texas retail jurisdiction.
- 2-16. Reference page 6, lines 8-13 of SWEPCO witness Seidel's direct testimony, please provide capital expenditures incurred for each of the three categories of distribution reliability programs for each of the last three calendar years and for the test year.
- 2-17. Reference page 6, lines 8-13 of SWEPCO witness Seidel's direct testimony, please provide the estimated annual reduction in customer minutes of interruption ("CMI") related to improvements for each of the three categories of distribution reliability programs for each of the last three calendar years and for the test year.
- 2-18. Please provide the total number of distribution circuits and total distribution circuit-miles for SWEPCO's Texas retail service area at year end for each of the last three calendar years and for the test year.
- 2-19. Reference page 18, Figure 5 of SWEPCO witness Seidel's direct testimony, please indicate whether the data presented in Figure 5 represent SWEPCO's total system or the Texas service area. If it represents total Company information, please provide the corresponding Texas retail jurisdiction data for all entries in this figure.

- 2-20. Reference page 18, lines 8-11 of SWEPCO witness Seidel's direct testimony, please indicate whether the referenced \$5.0 million increase in vegetation spending represents spending for SWEPCO's total system or the Texas service area.
- 2-21. Please provide SWEPCO's total vegetation management O&M expenditures for the total system and for the Company's Texas service area for each of the last three calendar years and for the test year.
- 2-22. Please provide SWEPCO's total vegetation management capital expenditures for the total system and for the Company's Texas service area for each of the last three calendar years and for the test year.
- 2-23. Please provide any analysis or supporting information provided to SWEPCO management to justify the proposed \$5.0 million increase in vegetation management spending.
- 2-24. Reference page 19, of SWEPCO witness Seidel's direct testimony, please provide the CMI, SAIDI and SAIFI related to vegetation causes for SWEPCO's total system and for the Company's Texas service area for each of the last three calendar years and for the test year.
- 2-25. Please identify the vegetation management cycle currently used by each SWEPCO affiliate and the annual expenditures for vegetation management by each affiliate for calendar year 2019.
- 2-26. Reference page 22, Figure 6 of SWEPCO witness Seidel's direct testimony, please provide the test year O&M by FERC account for SWEPCO's Texas retail jurisdiction and explain the basis for allocations to Texas for each distribution O&M account.
- 2-27. Reference page 23, Figure 7 of SWEPCO witness Seidel's direct testimony, please indicate whether the data presented in Figure 7 represent SWEPCO's total system or the Texas service area. If it represents total Company information, please provide the corresponding Texas retail jurisdiction data for all entries in this figure.